



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Mississippi Field Office
6578 Dogwood View Parkway, Suite A
Jackson, Mississippi 39213
March 14, 2008

Mr. Donald Silawsky
Office of Petroleum Reserves (FE-47)
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0301

Dear Mr. Silawsky:

We have received your Notice of Intent (NOI) to prepare a Supplemental Environmental Impact Statement (EIS) for Site Selection for the Expansion of the Strategic Petroleum Reserve. The NOI also mentions that public scoping meetings will be held on this proposal beginning in April 2008. Additionally, the NOI invites us to provide oral or written comments for the scoping meetings. The following comments are offered for inclusion in the administrative record for the upcoming public scoping meetings.

The Strategic Petroleum Reserve (SPR) is the United States stockpile of crude oil, which currently contains over 700 million barrels of crude oil in underground salt domes in Louisiana and Texas. The Department of Energy (DOE) began to coordinate with the Fish and Wildlife Service (Service) in 2005 concerning increasing their SPR. After completing the initial EIS, DOE selected a preferred plan in late 2006. The preferred plan in Mississippi included withdrawing about 50 millions gallons of water per day from the Leaf River and injecting the water into underground salt domes near Richton, Mississippi, to create caverns for storage of about 170 millions barrels of crude oil. The proposed water withdrawal would adversely impact two threatened species, the Gulf sturgeon and yellow blotched map turtle, plus one candidate species, the pearl darter. It would also result in adverse impacts to non-endangered fish species occurring in the Leaf River. These impacts would likely result from project induced low water levels on the Leaf River, which could result in depressed oxygen concentrations, an increase in toxic effects from contaminants, loss of feeding, spawning and basking habitat, and entrainment and impingement of eggs, fry, and juvenile fish and turtles.

Additionally, there is over 150 miles of pipelines associated with this proposal. The pipelines will adversely affect over 1000 acres of wetlands as well as result in loss of suitable habitat for the threatened gopher tortoise and the endangered quillwort. Millions of gallons of brine will be produced by dissolution mining of the salt domes. The brine would be carried to the coast via pipeline and released into the Mississippi Sound. The release of brine would seriously impact saltwater fish species and their associated habitat.

The Service and other fish and wildlife agencies have met with DOE on four occasions and voiced our concerns regarding our trust resources. During an April 2007 meeting, we and other fish and wildlife agencies recommended the following measures to reduce adverse impacts to trust resources.

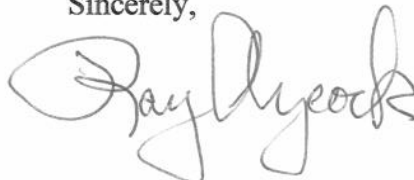
1. Water withdrawal from the Leaf River should not proceed below 30 percent of mean daily discharge (which could change pending the outcome of an instream flow study).
2. When flows are not adequate on the Leaf River, supplemental water sources should include the Mississippi Sound and deep aquifers to the north of the project area.
3. DOE should fund an instream flow study to provide scientific information for establishing minimum instream flows for the Leaf River.
4. DOE should work with concerned agencies to develop a plan to adequately mitigate losses of wetlands.
5. DOE should complete a literature search on screen design for raw water intake and provide the results to concerned agencies.
6. DOE should prepare a biological assessment that covers all of the listed and candidate species.

We understand that DOE will propose a new location for the raw water intake during the upcoming scoping meetings for the Supplemental EIS. The new location for water intake will be the Upper Pascagoula River near Merrill. The Service met in May 2007 with DOE concerning the new location for the raw water intake. We informed DOE that the same issues would be involved for both the Leaf River location and the Pascagoula River location. Therefore, our recommended conservation measures would be almost identical for both locations.

However, the Service objects to using the Pascagoula and Leaf Rivers as the primary water sources for the dissolution mining of the salt domes at Richton. We recommend that the Mississippi Sound or the Mississippi River be the primary water source, and that the brine be disposed in underground injection wells. These measures would avoid high damages to the high quality fish and wildlife resources of the Pascagoula River and the Mississippi Sound. We believe that these measures should be considered in the Supplemental EIS.

We appreciate the opportunity to provide comments for the upcoming scoping meetings for the Supplemental EIS concerning the expansion of the SPR. Contact Mr. Lloyd Inmon (601-321-1134) of my staff if you have any questions concerning our comments and recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Lybeck". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

Ray Aycock
Field Supervisor

Cc: Aaron Valenta, Fish and Wildlife Service, Regional Office, Atlanta Georgia

Todd Slack, Mississippi Museum of Natural Science, 2148 Riverside Drive,
Jackson, Mississippi 39202.

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